

United States General Accounting Office Washington, D.C. 20548

General Government Division

B-280530

November 9, 1998

The Honorable Alan Greenspan Chairman, Board of Governors of the Federal Reserve System

Subject: The Results Act: Observations on the Federal Reserve's 1998-99

Biennial Performance Plan

Dear Mr. Greenspan:

This letter provides our observations on the Federal Reserve System's (FRS) 1998-99 Biennial Performance Plan, which was submitted to Congress to address the requirements of the Government Performance and Results Act of 1993 (the Results Act). We were asked by the House Committee on Banking and Financial Services to review the plan along with annual plans submitted by other financial regulatory agencies. This letter provides (1) our assessment of how well FRS' performance plan meets the requirements of the Results Act and related guidance and (2) our observations for improving future performance plans.

Performance plans can be an invaluable tool for making policy decisions, improving program management, enhancing accountability, and communicating to both internal and external audiences how the long-term strategic direction outlined in strategic plans is translated into the day-to day activities of managers and staff. Successful implementation of a performance-based management system, as envisioned by the Results Act, represents a significant challenge requiring sustained agency attention.

While opportunities exist to improve FRS' initial performance plan, actions to date clearly show a good-faith effort to implement the Results Act.² On the

GAO/GGD-99-9R FRS Annual Performance Plan

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¹In cases where an agency operates on a fiscal year different from October 1 to September 30, the performance plan should correspond to the agency's fiscal year. FRS operates on a calendar year basis and does its planning and budgeting on a biennial basis.

²While FRS follows the requirements of the Results Act, we note that the Board of Governors believes that it is not covered by the Results Act.

basis of our discussions with your staff, we found FRS seriously committed to fulfilling both the requirements of the Act and congressional expectations that the plans inform Congress and the public about FRS' performance goals, including how the agency will accomplish the goals and measure the results. The points made in this letter are intended to assist FRS in its continued efforts to implement the Act. Therefore, the content of this letter focuses greater attention on areas where improvements might be made to enhance your plan and less on areas where FRS has already made significant progress.

BACKGROUND AND APPROACH

In recent years, agencies have faced demands to be more effective and less costly, coupled with a growing movement toward a performance-based approach to management. Congress enacted the Results Act in 1993 as part of a framework of reform legislation that included the Chief Financial Officers Act and information technology legislation, such as the Clinger-Cohen Act of 1996, to address these demands and instill performance-based management in the federal government. The Results Act is designed to improve the efficiency and effectiveness of federal programs by establishing a system to set goals for program performance and to measure results. The Act is intended to shift the focus of government decisionmaking and accountability away from a preoccupation with activities-such as bank examinations completed—to a focus on the results of those activities, such as improvements in bank safety and soundness.

Under the Results Act, agencies are to develop strategic plans, annual performance plans, and annual performance reports. The strategic plan serves as the starting point and basic underpinning of the performance-based management system and includes the agency's mission statement and the long-term goals and strategies that the agency will use to achieve these goals. In its first strategic plan for the Results Act, called the Government Performance and Results Act Planning Document 1997-2002 (Results Act Planning Document), FRS reported three strategic goals: (1) conduct monetary policy toward the achievement of maximum sustainable long-term growth; (2) promote a safe, sound, competitive, and accessible banking system and stable financial markets through supervision and regulation of the nation's banking and financial systems, through FRS' function as the lender of last resort, and through effective implementation of statutes designed to inform and protect the consumer; and (3) foster the integrity, efficiency, and accessibility of U.S. dollar payment and settlement systems, issue currency, and act as the fiscal agent and depository of the U.S. government.

The annual performance plan is to link the agency's day-to-day activities to its long-term strategic goals. The first FRS performance plan for 1998-99, reflecting the agency's biennial budget process, was submitted to Congress in July 1998. The first performance reports are due to Congress and the President no later than March 31, 2000. Performance

reports are to evaluate the agencies' progress toward achieving the goals in their performance plans.

The Results Act requires federal agencies to prepare annual performance plans covering the program activities set out in the agencies' budgets. These plans are to (1) establish performance goals to define levels of performance to be achieved; (2) express those goals in an objective, quantifiable, and measurable form; (3) briefly describe the operational processes, skills, and technology and the human, capital, information, or other resources required to meet the goals; (4) establish performance measures for assessing the progress toward or achievement of the goals; (5) provide a basis for comparing actual program results with the established goals; and (6) describe the means used to verify and validate measured values.

For purposes of our review, we collapsed the six requirements of the Results Act for performance plans into three core questions. These three core questions were as follows: (1) To what extent does the agency's performance plan provide a clear picture of intended performance across the agency? (2) How well does the agency's performance plan discuss the strategies and resources the agency will use to achieve its performance goals? (3) To what extent does the agency's performance plan provide confidence that its performance information will be credible? These questions are contained in our February 1998 congressional guide and our April 1998 evaluator's guide for assessing performance plans, which we used for our review.³

These guides integrated criteria from the Results Act, its legislative history, the Office of Management and Budget's (OMB) 1997 guidance for developing performance plans (OMB Circular A-11, part 2), a December 1997 letter to OMB from several congressional leaders, and our other reports on the implementation of the Results Act.⁴ We used the criteria and questions contained in the guides to help us determine whether the FRS plan fully met the requirements of the Act and to identify strengths and weaknesses in the plan.

³See <u>Agencies' Annual Performance Plans Under the Results Act: An Assessment Guide to Facilitate Congressional Decisionmaking (GAO/GGD/AIMD-10.1.18, Feb. 1998) and The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans (GAO/GGD-10.1.20, Apr. 1998).</u>

⁴See <u>The Government Performance and Results Act: 1997 Governmentwide</u> <u>Implementation Will Be Uneven</u> (GAO/GGD-97-109, June 2, 1997) and <u>Managing for Results: Agencies' Annual Performance Plans Can Help Address Strategic Planning <u>Challenges</u> (GAO/GGD-98-44, Jan. 30, 1998).</u>

We obtained oral comments on a draft of this letter from the Associate Director, Finance, and other FRS staff. These comments are discussed at the end of this letter. We did our work in July and August, 1998, at FRS in Washington, D.C., in accordance with generally accepted government auditing standards.

RESULTS IN BRIEF

FRS has made a good initial effort in preparing its first performance plan. As discussed in the sections that follow, the plan contains all of the elements required by the Results Act and is directly linked to FRS' Results Act Planning Document's strategic goals. The plan's goals also cover all of the functional areas described in FRS' budget, and the performance objectives for each goal define performance expectations in more detail. However, the plan could be more useful for congressional oversight if it (1) expressed performance goals more objectively and quantifiably and fully measured performance goals; (2) simplified performance expectations for several performance goals and linked them directly to specific measures and targets that match the performance expectations; (3) developed additional outcome measures; (4) more directly linked strategic goals and annual performance goals; (5) more clearly explained plans for coordinating efforts with other financial regulatory agencies; (6) better explained how FRS' strategies and resources will help achieve its performance goals; and (7) provided more specific information on how FRS verifies and validates performance information and addresses the data limitations.

THE FRS PERFORMANCE PLAN IS TO PROVIDE A CLEAR PICTURE OF INTENDED PERFORMANCE

The Results Act and related guidance call for a performance plan that clearly defines expected performance; connects goals, mission, and activities; and recognizes crosscutting efforts. Under the Act, the plan is required to provide a basis for an agency's comparison of actual results with performance goals. For this comparison, an agency needs to set goals and develop appropriate performance measures and show how it will use them to measure performance across the agency. By showing the relationship between the annual performance goals and the agency's strategic goals and mission, an agency's performance plan can demonstrate how the agency intends to progress toward achievement of the strategic goals. An agency's plan should also discuss the performance goals that support programs or activities of a crosscutting nature.

FRS' plan is a good start toward setting out the system's expected performance. For example, the plan sets out performance goals and objectives for each strategic goal. However, the plan could better address intended agency performance in several ways. These ways include (1) improving performance goals to make them more objective and quantifiable and less complex, (2) more fully measuring performance goals and improving

performance measures and targets, (3) developing more outcome measures, (4) better clarifying the relationship between strategic goals and performance goals, and (5) more clearly explaining coordination efforts with other financial regulatory agencies.

Defining Expected Performance

The Results Act requires an agency's performance plan to contain both a set of goals that establishes an agency's intended performance and measures that can be used to assess progress toward achieving those goals. The Act defines a performance goal as a target level of performance that is expressed as a tangible, measurable objective against which actual achievement can be compared and includes goals expressed as a quantitative standard, value, or rate. A performance measure is a tabulation, a calculation, a recording of activity or effort, or an assessment of results that is compared to an intended purpose. A performance goal that is expressed objectively and quantifiably and does not require additional measures is considered self-measuring.

The FRS plan has at least one performance goal for each strategic goal. However, there are several ways in which FRS could provide a more succinct and concrete statement of expected performance for subsequent comparisons with actual performance. First, although there is no requirement that various types of performance goals be included in the plan, the FRS plan might be improved by providing more self-measuring goals. Each FRS performance goal in the plan is stated in such a way that it is not self-measuring and, thus, relies on several performance measures to determine if the goal is achieved. For example, the following FRS performance goal is not self-measuring: "Promote overall financial stability, management and containment of systemic risk, and ensure that emerging threats to the health of the financial system are identified early and successfully resolved." This goal contains several general performance expectations, not all of which are covered by measures in the plan.

⁵According to recent (July 1998) OMB guidance, the Results Act allows an agency to define a performance goal in a way that is not self-measuring. If a goal is not self-measuring, one cannot determine whether the goal was achieved by simply and objectively comparing actual performance to the performance goal as it is defined. Therefore, for a goal that is not self-measuring, the agency must include in its plan one or more performance indicators for that goal that set out specific, measurable values or characteristics related to the performance goal.

FRS' plan includes performance objectives that provide more specifics on the performance expected for the performance goals. FRS may want to use these performance objectives as performance goals that either could be self-measuring or could use multiple measures to define the expected performance for each objective. By doing so, FRS would be drawing a more direct link from performance expectations to measures. At present, performance measures in the plan are not directly identified for individual performance objectives.

Another approach would be to convert existing performance measures and targets into better-defined performance goals and/or performance objectives. The FRS plan's performance measures and targets for the individual measures are often stated with performance goals. For example, performance measures include those to meet the demand for currency of an acceptable level or quality or to issue guidance designed to ensure compliance with consumer protection laws. Performance targets for individual measures include conducting examinations in accordance with timeliness standards and performing supervisory follow-up on institutions with a CAMELS rating of 3, 4, or 5. Measures and targets such as these could be converted into performance goals. For example, a performance goal could be to "Conduct 100 percent of examinations on time and provide supervisory follow-up for corrective action on all institutions with a CAMELS rating of 3, 4, or 5." Measures then would be the percentage of examinations on time; the percentage of institutions with a CAMELS rating of 3, 4, or 5; and the percentage of those institutions receiving supervisory follow-up and corrective action.

Second, FRS may want to consider simplifying performance goals by not including multiple performance expectations and by removing activities (strategies) from performance goal statements. Presently, the FRS performance goals often include multiple performance expectations and/or activities. It is difficult for the reader to understand the overall performance expectation and when it will be achieved when several expectations are stated for each goal. For example, one performance goal in the plan is to "improve efficiency, effectiveness, and consistency of the supervisory process while reducing burden on supervised institutions by enhancing the supervision function's

⁶Regarding Results Act strategic plans, OMB guidance discusses the use of general objective statements to complement a general goal whose achievement cannot be directly measured. The guidance does not discuss general objective statements for the performance goals since these goals should either be self-measuring or use one or more performance measures to set out specific, measurable values or characteristics that are related to the performance goal.

⁷FRS evaluates the soundness of banks on the basis of factors called CAMELS (i.e., capital adequacy, asset quality, management, earnings, liquidity, and sensitivity to risk). CAMELS ratings range from 1 to 5, with 1 indicating the best rating.

procedures, technology, resource allocation in relation to risk skills, and staffing." This performance goal has expectations to improve the efficiency, effectiveness, and consistency of the supervisory process and reduce burden on supervisory institutions. It will be difficult for FRS to separate out the very different factors of the supervisory process' efficiency, effectiveness, and consistency as well as the reduction of institutional burden. This goal could be improved by separating the different factors into specific performance goals, such as improving the efficiency of the supervisory process by a certain percentage. In addition, the activities to accomplish these performance expectations are to enhance the supervision function's (1) procedures, (2) technology, and (3) resource allocation. These activities are strategies and means that should be addressed in a separate section under each performance goal.

Third, FRS could improve the plan by more fully measuring the plan's performance goals. For example, the performance objective to "remove unnecessary restrictions consistent with safety and soundness" under the performance goal for improving the supervisory process does not have a performance measure. In addition, the plan does not describe separate performance measures for each performance goal in the banking supervision and regulation function. Instead, the plan describes six performance measures for two performance goals, thereby making it difficult to differentiate which measures apply to which performance goal. Also, the performance objectives of (1) maintaining ability and capacity as a bank supervisor, and (2) promoting sound banking and effective supervisory practices among developed and emerging counties, do not have corresponding measures.

Also, as a matter of Board policy, measures are not provided for the monetary policy function, even though this is a strategic goal area in the FRS Results Act Planning Document. An FRS official stated that congressional staff had indicated agreement with this policy, and that FRS performance is discussed in the semiannual testimony the agency provides to Congress in response to the Full Employment and Balanced Growth Act of 1978 (frequently called Humphrey-Hawkins). However, FRS stated in its Results Act Planning Document that the agency can be judged in monetary policy by whether its research is successful in anticipating problems and changes in the economy. The performance plan does not reflect this judgment. We believe measures could be developed in the performance plan to cover research capabilities or educational efforts, both of which are mentioned in the monetary policy function's performance objectives. FRS could also develop measures for the quality and timeliness of its policy reports and how it promotes the understanding of policy among other officials and the general public.

Fourth, FRS could improve several of the plan's performance targets, which were not established or do not match their corresponding performance measures. For example, a performance target was not established for the measure of identifying supervisory and/or financial problems in a timely manner and resolving them. In addition, one performance measure is to contract for an outside audit of the financial statements of the Federal

Reserve Board, but the measure's target is having a clean opinion on the accuracy of the Board's annual financial statements and internal controls. Both the measure and the related target should address the same performance objective. Another improvement would be to discuss the rationale for setting two of the performance targets lower than historical performance.

Lastly, FRS may want to expand the use of outcome measures and targets in the plan to reflect the results of its activities. Several measures and targets are outcome-oriented, such as the measure of payment system applications and interfacing systems meeting Year 2000 compliance or the target to meet high-quality currency requirements. However, the majority of the plan's performance measures and targets are process- or output-oriented or reflect strategies. For example, measures and targets regarding completing a certain percentage of examinations or reports of examinations within a certain time frame are output and process measures. Such measures and targets identify completed activities or how internal agency processes function, not program results.

We recognize that establishing outcome measures is a challenge for regulatory agencies, where it can be difficult to relate activities to the results of activities. An FRS official observed that over time FRS will change its focus from outputs to more outcomes. However, officials also said that there is some concern that a greater focus on outcomes orientation could create unintended results. For example, the officials said that using an outcome, such as improving CAMELS ratings by a certain amount, might create a conflict of interest between examiners' desire for a rating to show FRS' examination capabilities and influence over the institution and a rating that shows the actual safety and soundness condition of the institution. The officials said that the end result might be CAMELS ratings that are not warranted. While we are not suggesting that FRS adopt this measure, we believe that such measures, if adopted, may have other safeguards in place, such as quality assurance reviews, to prevent this issue from becoming a significant problem.

Connecting Mission, Goals, and Activities

According to the Results Act and its guidance, a clear relationship should exist between an agency's long-term strategic goals and mission and the performance goals in the performance plan. Performance goals should also cover each program activity in the agency's budget, which FRS does by having one or more performance goals for each

⁸OMB guidance emphasizes that outcome goals should be included in a performance plan whenever possible. A performance plan should include outcome goals when their achievement is scheduled for the year covered by the performance plan. The guidance notes that most plans will supplement outcome goals with measures of output. Measures of output can be the predominant goals and measures in an annual performance plan in certain circumstances.

functional area described in its budget. However, the FRS plan could be improved by more clearly defining the relationship between long-term strategic goals in the Results Act Planning Document and the performance goals in the performance plan.

Under the Results Act, strategic goals are long-term general goals, such as those FRS has in its Results Act Planning Document. Performance goals should be more specific because they are intended to connect the long-term strategic goals to the day-to-day activities of program managers and staff. In the functional areas of the FRS performance plan, FRS could make its performance goals and objectives more specific than its strategic goals and objectives. For example, the two performance goals for the banking supervision and regulation function are similar in language to the strategic goal and objectives they support. The payment systems and financial services function has performance goals and objectives that are identical to the strategic goals and objectives. As we previously mentioned, the performance goals could be more specific by converting current FRS performance objectives or measures or targets into performance goals that might be more readily connected to day-to-day FRS activities.

Recognizing Crosscutting Efforts

Results Act guidance states that an agency's performance plan should identify those performance goals that are being mutually undertaken with other agencies in support of programs or activities of an interagency, crosscutting nature. The FRS plan discusses the need to coordinate efforts and actions with the other financial regulatory agencies having related strategic or performance goals. The plan also discusses FRS coordination with the Department of the Treasury and other depository institution regulatory agencies in the Federal Financial Institutions Examinations Council and in a Results Act interagency working group. An FRS official said that coordination with the other regulatory agencies has resulted in crosscutting efforts such as those associated with Year 2000 compliance. However, specific crosscutting performance goals and measures are not included in the performance plan. Although this coordination with other agencies is a

⁹OMB's July 1, 1998, Circular A-11 guidance states that at a minimum, the performance plan should indicate those programs or activities that are being undertaken with other agencies to achieve a common purpose or objective. An agency should also review the fiscal year 1999 performance plans of other agencies participating with it in a crosscutting program or activity to ensure that goals and indicators for a crosscutting program are consistent and harmonious.

¹⁰In addition to FRS, the interagency working group and the Federal Financial Institutions Examination Council include the following depository institution regulatory agencies: the Federal Deposit Insurance Corporation, the National Credit Union Administration, the Office of the Comptroller of the Currency, and the Office of Thrift Supervision.

necessary first step, Results Act guidance encourages agencies to go beyond coordination and develop common performance goals and measures for related programs. These performance goals and measures could address common regulatory problems, such as federal bank oversight system inconsistencies in examination policies and practices and enforcement actions identified in our earlier work.¹¹

THE FRS PLAN SHOULD DISCUSS STRATEGIES AND RESOURCES TO ACHIEVE PERFORMANCE GOALS

The Results Act requires that performance plans describe the strategies and resources the agency intends to use to achieve its performance goals. Typically, strategies cover an agency's operational processes, skills, and technologies that will be used to achieve program goals. Resources cover capital, human, financial, and other resources. The FRS plan describes detailed strategies and resources for each of the three functional areas and for internal board support to meet performance goals. However, the plan could be improved by describing strategies and resources for each performance goal in the banking and supervision function, making it easier to assess if the strategies and resources are adequate for achieving individual performance goals.

Connecting Strategies to Results

The Results Act and related guidance require the performance plan to briefly describe the agency's strategies to accomplish its performance goals. The FRS plan provides considerable detail on most strategies, but the plan could be improved in the banking supervision and regulation function. The plan does not clearly separate the strategies appropriate for each of the function's three performance goals, thereby making it difficult to assess if the strategies are appropriate for achieving each performance goal.

In addition, the description of strategies for safety and soundness goals in the banking supervision and regulation function is a list of goals and objectives, not specific strategies. For example, as strategies for achieving these goals, the plan lists objectives such as maintaining adequate expertise and involvement and promoting market discipline. In contrast, the plan's other functional areas provide details on strategies, including operational processes, skills, and technologies. For example, the payment systems and financial services function has details on the use of technology to achieve the goals and objectives in that area.

¹¹See <u>Bank and Thrift Examinations: Adoption of Risk-Focused Examination Strategies</u> (GAO/T-GGD-98-13, Oct. 8, 1997).

FRS' Results Act Planning Document also identifies four management issues that the performance plan's strategies only partially address. The performance plan discusses only two of the four issues: Year 2000 compliance of FRS information systems and the financial institutions it regulates and the modification of the FRS strategic planning and budget process. The performance plan does not specifically discuss the other two issues: examining the role of FRS in providing financial services to banks and government agencies and strengthening internal control and oversight of the Reserve Banks. FRS officials said that FRS made a management decision not to address internal control and oversight of the Reserve Banks in the plan. However, we believe internal controls and oversight of the Reserve Banks should warrant attention in the performance plan because they are a vital part of FRS' operations and reflect key program activities in the agency's budget.

Lastly, the FRS performance plan discusses the impact of external factors in general terms. However, the plan could be improved by discussing the factors pertinent to each functional area and what strategies FRS plans on using to address them. Although the Results Act does not require that the performance plan specifically discuss the impact of external factors on achieving performance goals, a discussion of such factors provides additional context regarding anticipated FRS performance.¹²

Connecting Resources to Strategies

The Results Act requires that the plan briefly describe the capital, human, financial, and other resources being applied to achieve the performance goals. As with strategies, the FRS performance plan discusses resource details by the three functional areas and internal board support. The plan could be improved if it also discusses resources for each performance goal in the banking and supervision function. This would provide an explanation of how resources will help achieve specific performance goals for that function.

THE FRS PLAN IS TO PROVIDE CONFIDENCE THAT PERFORMANCE INFORMATION IS CREDIBLE

The Results Act and OMB guidance requires that the performance plan describe the means used to verify and validate measured values. The guidance notes that the plans should also identify significant data limitations and discuss how the limitations or other factors affect the credibility of performance information. FRS' plan provides information on performance data verification and validation procedures by the three functional areas and internal board support. However, in most cases, the discussion of such procedures is

¹²See GAO/GGD-10.1.20.

general, does not cover individual performance measures, and does not address data limitations.

Verifying and Validating Performance

Results Act guidance states that the plan should describe credible procedures to verify and validate the measured values of actual performance. The agency should have in place procedures for ensuring that the data are free of significant levels of error and that bias is not introduced. These procedures can include internal controls over such matters as data collection, maintenance, and entry. External assessments, such as audits, evaluations, and peer reviews, are other important procedures for verifying and validating performance information.

FRS could improve its plan by discussing validation and verification of measured values for each individual performance measure, rather than in a general section for each functional area and for internal board support. In addition, the plan most often discusses data sources, data collection points, and data compilation but does not discuss procedures to ensure performance information credibility. For example, the monetary policy function area in the plan discusses the use of performance information to prepare reports and analyses and data sources. This section of the plan also notes that there are efforts to improve the quality of the economic data and funding to cover economic surveys, methodology studies, and reviews of changes in automation and telecommunications equipment. However, no details are provided on actual verification and validation of the information. FRS may want to consider providing further explanation of verification and validation procedures similar to the explanation provided for the payments systems and financial services function and internal board support. For example, the payment systems and financial services function area discusses performance information validation by external sources, such as a private accounting firm.

An FRS official said that the availability and accuracy of performance information is not a problem for the agency. According to the official, the Board of Governors sets standards for data collection and there is a planning and control system. In addition, audits of the accuracy of performance information is done regularly for both internal and external sources. If this is the case, it would be useful for the plan to describe specifics such as these.

Recognizing Data Limitations

The Results Act guidance states that, as appropriate, the plan should identify and describe in sufficient detail the specific performance data required and the means for collecting, maintaining, and analyzing the data to allow an assessment of the extent on which they can be relied. The FRS performance plan would be more useful if it discussed data

limitations of internal and external data sources and their implications for assessing the achievement of performance goals.

AGENCY COMMENTS

We provided FRS with a draft of our observations and met with the Associate Director, Finance, and other FRS officials on August 12, 1998, to obtain their comments. We also subsequently provided FRS with a draft of this letter for comment. Although FRS officials agreed that improvements could be made, the officials also commented that our observations emphasize the negative versus the positive aspects of the performance plan. They added that the goals, objectives, performance measures, and targets are at the most appropriate level for the agency's initial submission of a performance plan. However, as the plan evolves over the next few years, they expect refinements to be made that would likely include our suggested alternative approaches. Overall, they emphasized that the plan reflected a serious effort in implementing the Results Act. We agree that FRS has made a good-faith effort. As we previously stated, our observations are intended to assist FRS in its efforts to improve future plans for congressional oversight and agency decisionmaking and, ultimately, FRS operations. FRS also provided us with other technical comments that we incorporated into this letter as appropriate.

We are sending copies of this letter to the Chairman and Ranking Minority Member of the House Committee on Banking and Financial Services. We will also make copies available to others on request.

This report was prepared under the direction of Kane Wong, Assistant Director. Other major contributors are listed in the enclosure. Please contact me at (202) 512-8678 or Mr. Wong at (415) 904-2123 if you or your staff have any questions.

Sincerely yours,

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Associate Director, Financial Institutions

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and Markets Issues

Enclosure

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ENCLOSURE

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RELATED GAO PRODUCTS

Results Act: Observations on Treasury's Fiscal Year 1999 Annual Performance Plan (GAO/GGD-98-149, June 30, 1998).

Managing for Results: Experiences of Selected Credit Programs (GAO/GGD-98-41, Feb. 19, 1998).

The Results Act: Observations on Draft Strategic Plans of Five Financial Regulatory Agencies (GAO/T-GGD-97-164, July 29, 1997).

Managing for Results: Regulatory Agencies Identified Significant Barriers to Focusing on Results (GAO/GGD-97-83, June 24, 1997).

Managing for Results: Analytic Challenges in Measuring Performance (GAO/HEHS/GGD-97-138, May 30, 1997).

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